

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

WAKEELAH A. COCROFT, )  
Plaintiff )  
vs. ) Docket No.  
JEREMY SMITH, ) 10-CV-40257 - FDS  
Defendant )

**PARTIES' JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1 (D)**

Pursuant to this Court's Notice of Scheduling Conference of April 14, 2011, and Fed. R. Civ. P. 16 (b) and Local Rule 16.1, counsel for the parties conferred by telephone on May 12, 2011. The parties hereby submit their joint statement containing a proposed pretrial schedule.

**(1). Initial Disclosures:** 45 days from the date of the Scheduling Conference. (must be completed by July 1, 2011).

**(2). Amendments to Pleadings:** 60 days from the Scheduling Conference. (July 16, 2011).

**(3). Fact Discovery (Interim Deadlines):**

a. Requests for Document Production, Interrogatories and requests for admissions served by October 28, 2011.

b. Depositions (other than experts) December 1, 2011.

**(4.) Final Fact Discovery Deadline:** March 1, 2012.

**(5.) Status Conference held on or before:** March 1, 2012, or on a date to be

determined by the Court.

**(6.) Experts:**

- a. Plaintiff's trial expert designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed by April 2, 2012.
- b. Plaintiff's trial experts must be deposed by May 2, 2012.
- c. Defendant's trial experts designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed by June 1, 2012.
- d. Defendant's trial experts must be deposed by June 29, 2012.

**(7.) Dispositive Motions** – to be filed by August 1, 2012. Oppositions 45 days later.

**(8.) Initial Pre-trial Conference:** Date to be determined by the Court.

Respectfully submitted,

Plaintiff, WAKEELAH COCROFT

By her attorneys,

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Defendant, JEREMY SMITH

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Dated: May 12, 2011